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Attorneys for Plaintiff  
JOHN DOE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JOHN DOE,

Case No. 2:23-cv-00180-AC

Plaintiff,

V.

COUNTY OF SOLANO, ARMANDO  
ESPINOZA, and STEPHANIE M. GARCIA, and  
DOES 1 through 20, inclusive.

## Defendants

**THIRD STIPULATION AND  
[PROPOSED] ORDER TO CONTINUE  
DEADLINE TO JOIN ADDITIONAL  
PARTIES**

Pursuant to Local Rules 143 and 137(b), plaintiff John Doe (“Plaintiff”) and defendants County of Solano (“County”), Armando Espinoza and Stephanie Bachman (erroneously sued as Stephanie M. Garcia) (collectively, “Defendants”) (all parties, collectively, the “Parties”) stipulate as follows:

1. Plaintiff filed his complaint against Defendants on December 28, 2022 in the Superior Court of the State of California, County of Solano. Dkt. No. 1, Ex. A. The complaint included doe defendants.
2. Defendants removed the action to this Court on January 30, 2023. Dkt. No. 1.
3. The Court entered a scheduling order on June 23, 2023, which set August 31, 2023 as the deadline to join additional parties. Dkt. No. 15, p. 1:22-25.
4. On July 14, 2023, Plaintiff issued discovery to defendant County of Solano intended to assist

1 him with identifying doe defendants. Plaintiff granted defendant County of Solano an extension of  
2 time to respond to that discovery until August 28, 2023.

3 5. On August 16, 2023, pursuant to the Parties' stipulation, the Court extended the deadline for  
4 joining additional parties to September 29, 2023. This extension was granted to permit Plaintiff time  
5 to review defendant County of Solano's discovery responses in the event they disclosed the identity of  
6 individuals that the complaint currently identifies as doe defendants and to allow the Parties additional  
7 time to address privacy concerns Defendants have raised and which they contend prevents them from  
8 providing certain information Plaintiff has requested in discovery.

9 6. On September 28, 2023, the Court entered an order pursuant to the Parties' second stipulation  
10 to extend the deadline for joining additional parties to November 13, 2023. The extension was granted  
11 to permit Plaintiff's counsel time to review the discovery responses of defendant County of Solano,  
12 including a lengthy document production, and to permit the deposition of one or more person(s) most  
13 knowledgeable at defendant County of Solano in order for Plaintiff to understand certain jail processes  
14 and to gather information in the event that that additional discovery discloses the identity of  
15 individuals that the complaint currently identifies as doe defendants.

16 7. On October 12, 2023, Plaintiff's counsel provided a detailed meet and confer letter regarding  
17 the County's discovery responses. On that date, Plaintiff also issued a notice of deposition pursuant to  
18 Federal Rule of Civil Procedure 30(b)(6) for November 2, 2023. Counsel for the Parties met and  
19 conferred by telephone on November 1, 2023 regarding these discovery issues. The Parties are  
20 attempting to re-schedule the noticed Rule 30(b)(6) for mid-November.

21 8. The deadline for joining additional parties should be extended a third time, for 45 days, until  
22 December 28, 2023. This extension will allow time to schedule and conduct the deposition of the  
23 person(s) most knowledgeable at defendant County of Solano and/or to conduct other discovery  
24 primarily directed at identifying doe defendants, and also to attempt to resolve the privacy concerns  
25 that Defendants contend prevent them from providing certain information requested in discovery.

26 It is so stipulated.

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28 //

1 Dated: November 6, 2023

EMANUEL LAW GROUP

3 By: /s/ Pamela E. Glazner

4 Pamela E. Glazner

5 Attorneys for Plaintiff JOHN DOE

6 Dated: November 6, 2023

7 HAWKINS PARNELL & YOUNG, LLP

8 By: /s/ Danielle K. Lewis (authorized on 11/6/2023)

9 Danielle K. Lewis

10 Attorneys for Defendants COUNTY OF

11 SOLANO, ARMANDO ESPINOZA and

12 STEPHANIE BACHMAN (erroneously sued as  
13 STEPHANIE M. GARCIA)

**[PROPOSED] ORDER**

The Court, having reviewed the foregoing Stipulation, and good cause appearing therefor, hereby orders that the deadline for joining additional parties is extended to December 28, 2023.

IT IS SO ORDERED.

DATED: November 7, 2023

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE